

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
MARGARET W. LAMBROSE  
3 Assistant Federal Public Defender  
Nevada State Bar No. 116262  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Maggie\_lambrose@fd.org

7 Attorney for Emmitt Dee McCants

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 EMMITT DEE MCCANTS,

15 Defendant.

Case: 2:18-cr-00071-RFB-CWH-1

**STIPULATION TO CONTINUE  
PRETRIAL MOTION DEADLINES**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson,  
18 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Emmitt Dee McCants,  
21 that the previously ordered deadline for filing of pretrial motions be vacated and that the parties  
22 herein shall have to and including June 4, 2018, within which to file the Defendant's pretrial  
23 motions.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
25 shall have to and including June 18, 2018, to file any and all responsive pleadings.  
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including June 25, 2018, to file any and all replies to dispositive motions.

3 The Stipulation is entered into for the following reasons:

4 1. Counsel for the defendant needs additional time to meet and discuss the  
5 government's proposed resolution with her client; and to determine whether to file a pretrial  
6 motion should her client reject the government's proposed resolution.

7 2. The defendant is incarcerated and does not object to the continuance.

8 3. The parties agree to the continuance.

9 4. The additional time requested herein is not sought for purposes of delay, but  
10 merely to allow counsel for defendant sufficient time within which to discuss the proposed  
11 resolution with her client.

12 5. Additionally, denial of this request for continuance could result in a miscarriage  
13 of justice.

14 This is the first request to continue trial dates filed herein.

15 DATED this 15th day of May, 2018.

16  
17 RENE L. VALLADARES  
18 Federal Public Defender

DAYLE ELIESON  
United States Attorney

19 By /s/ Margaret W. Lambrose  
20 MARGARET W. LAMBROSE  
21 Assistant Federal Public Defender

By /s/ Robert Knief  
ROBERT KNIEF  
Assistant United States Attorney

## 1

## 2

3

4

5

6

7

8

## 9

## 10

11

12

13

14

15

16

17

18

19

**ORDER**

IT IS THEREFORE ORDERED that the parties herein shall have to and including June 4, 2018, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including June 18, 2018, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including June 25, 2018, to file any and all replies to dispositive motions.

DATED this 16th day of May, 2018.



---

RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE